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EXHIBIT A
SUMMARY OF INFORMATION REDACTED FROM HNAH BOARD OF DIRECTORS AGENDAS AND MINUTES (BATES RANGE HNAH-JURIS-0078-0191)

1. Agendas

The Agendas are irrelevant to the limited jurisdictional issue before this court, and the information redacted therein is not only irrelevant, but contains descriptions of matters that are proprietary and confidential to HNAH's business practice. For example, the Agendas list matters related to HSBC entities having no relation to this litigation, and sensitive strategic or legal matters that should not be revealed to third parties. Allowing broad discovery into HNAH's Board Meeting Agendas would not only allow disclosure of confidential information to third parties, but would potentially inhibit its Board of Directors from acting with efficiency and candor in the future.

HNAH-JURIS-0078-0085

2. General Counsel / Legal Reports

Minutes related to General Counsel's Report and other internal legal issues are irrelevant to the limited jurisdictional issue before this Court. Additionally, information contained therein is confidential, proprietary, highly sensitive, and protected by the attorney work product and attorney client privileges. Broad examples of such protected information includes discussions regarding the effects of changes in certain laws, and inquiries and presentations by regulators. These matters were presented to the Board with the expectation that they be protected from disclosure so that the Board could act with thoroughness and candor. Revelation of sensitive legal matters could severely undermine the competitive advantage and operation of HNAH.

HNAH-JURIS-0123
HNAH-JURIS-0132
HNAH-JURIS-0134
HNAH-JURIS-0135
HNAH-JURIS-0143
HNAH-JURIS-0148-151
HNAH-JURIS-0156-157
HNAH-JURIS-0161
HNAH-JURIS-0164-166
HNAH-JURIS-0175
HNAH-JURIS-0176-177

3. Strategic Planning, Development, and Potential Acquisitions

Minutes containing information relating to strategic planning, development, or potential acquisitions are irrelevant to the limited jurisdictional issue before this Court.

Additionally, the information contained therein, such as discussions of business constraints and competitiveness, is protected from discovery by FRCP 26(c)(7) because it involves confidential research, development, or commercial information. Allowing disclosure of such strategic information would be harmful to HNAH and the various competitive businesses of its many subsidiaries.

HNAH-JURIS-0134
HNAH-JURIS-0142-0143
HNAH-JURIS-157
HNAH-JURIS-169-171
HNAH-JURIS-175

4. Corporate Structure and Policies

Minutes containing information related to corporate structure and policies are irrelevant to the limited jurisdictional issue before this Court, as set out in this Court's May 15, 2007 Order. These documents contain no information regarding the relationship between HNAH and HBUS, and thus, do not show any potential day-to-day control by HNAH over HBUS.

HNAH-JURIS-0124-126
HNAH-JURIS-185
HNAH-JURIS-187
HNAH-JURIS-0144-145

5. Capital Contributions / Restructuring / Dividend payments

Minutes related to internal corporate and financial operations between HNAH's related companies, including those having no relation to this litigation, are irrelevant to the limited jurisdictional issue before this Court. These permissible and expected activities between a parent and subsidiary company in no way demonstrate day-to-day control of internal business operations or affairs by HNAH over HBUS. Further, this information should be protected from discovery because it is confidential financial information regarding the internal operations and processes of HNAH.

HNAH-JURIS-0091-0095
HNAH-JURIS-0100-0101
HNAH-JURIS-0102-0103
HNAH-JURIS-0128-0129
HNAH-JURIS-0151
HNAH-JURIS-0160-0161
HNAH-JURIS-0168-0169
HNAH-JURIS-0178-0179

6. Pension, Retirement, Compensation Plans

The structure and administration of employee benefit plans of HNAH and subsidiaries, including those having no relation to this litigation, are irrelevant to the limited jurisdictional issue before this Court. These internal plans have no bearing on whether or not HNAH controlled the day-to-day business activities of HBUS. Further, such information is confidential and proprietary and should be protected from discovery.

HNAH-JURIS-0097-99
HNAH-JURIS-0104-0122
HNAH-JURIS-0136-0138
HNAH-JURIS-0145-0146
HNAH-JURIS-0149-0150
HNAH-JURIS-0155
HNAH-JURIS-0164

7. Financial Reports, Business Reports / Overviews

Minutes containing information regarding financial reports, management presentations and overviews, including businesses having no relation to this litigation, are irrelevant to the limited jurisdictional issue before this Court. Further, these Minutes are confidential and proprietary and do not relate to whether or not HNAH controls the day-to-day internal business of HBUS. Further, such information is confidential and proprietary and should be protected from discovery.

HNAH-JURIS-0130
HNAH-JURIS-0131
HNAH-JURIS-0133-0134
HNAH-JURIS-0142
HNAH-JURIS-0149
HNAH-JURIS-0159-0160
HNAH-JURIS-0168
HNAH-JURIS-0178
HNAH-JURIS-0180-181
HNAH-JURIS-0185
HNAH-JURIS-0188-0190

8. Confidential Supervisory Information

HNAH is regulated by the Board of Governors of the Federal Reserve Board, and thus, is prohibited from disclosing confidential supervisory information, including reports of examination or any portion of such reports. See 12 C.F.R. §§162.2(c)(1), 261.20(g), and 261.22(e). The Minutes contain confidential and proprietary information generated in the course of performing important government functions by the supervising authorities, and neither HNAH nor HBUS can disclose information related thereto.

HNAH-JURIS-0084
HNAH-JURIS-0132
HNAH-JURIS-0134
HNAH-JURIS-0148
HNAH-JURIS-0151
HNAH-JURIS-0161
HNAH-JURIS-0164
HNAH-JURIS-0165
HNAH-JURIS-0176
HNAH-JURIS-0177
HNAH-JURIS-0178